



State of Illinois

# ENVIRONMENTAL PROTECTION AGENCY

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/785-8729

August 23, 1995

Mr. Brad Bradley  
Remedial Project Manager  
Office of Superfund (HSRL-6J)  
USEPA Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604

**Re: NL/Taracorp  
L1190400007  
Superfund Technical  
DD/ESD Document Review**

EPA Region 5 Records Ctr.



257881

Dear Brad:

I received pages 3 - 20 of the Decision Document (DD) / Explanation of Significant Differences (ESD) for the above-referenced site that you faxed to me on Tuesday, August 15th. Except for the few comments listed below, the Illinois Environmental Protection Agency concurs with the content, proposals, and conclusions of this portion of the DD/ESD.

The State still feels that it is necessary to install a leachate collection system underneath all newly created segments of the waste pile. This Agency's interpretation of the CERCLA Compliance with Other Laws Manual, RCRA ARARs: Focus on Closure Requirements section that outlines actions constituting disposal leads me to believe that the excavated industrial soils and battery chip materials on the properties adjacent to the main waste pile (i.e. Taracorp, Trust 454, BV&G Transport, and Rich Oil, including the SLLR pile) could be added, without treatment, to the existing Taracorp waste pile without constituting disposal and therefore without RCRA compliance (i.e. leachate collection). However, if the industrial soils or the contents of the SLLR pile are treated, which is the current proposal for any of the materials exhibiting TCLP lead values above the 5 mg/l threshold, before they are added to the main waste pile, then disposal has occurred and compliance with RCRA is applicable. Defining the off-site soils and fill materials as being within the same 'area of contamination' with the industrial site and the main waste pile is disputable. The USEPA proposal of up to four pumping wells along with groundwater monitoring along with a contingency plan appears to be adequate since there are no identified groundwater receptors down gradient from the main waste pile.

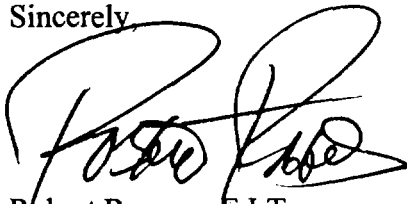
The subject document states that residential areas with paving uses (alleys, driveways, and parking lots) are to be capped without excavation. The document reads as though residential yards will be excavated until total lead concentrations are below 500 ppm. It is the

understanding of this Agency that the current practice in residential areas is to leave lead contaminated soil and battery case material in place at depths exceeding three feet. If correct, this should be outlined in this document since it is not stipulated in any other documents pertaining to the site. A contingency plan should be developed to deal with possible uncovering of lead contaminated material from future excavations for utilities and/or other digging activities.

Finally, pages 8, 10, and 18 have the word "bases" where the intention is probably to print the word "basis" such as on page 17.

If you have any questions or comments, please contact me at 217/785-8729 or at the above address.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Rogers', with a large, stylized flourish at the end.

Robert Rogers, E.I.T.  
National Priorities List Project Manager  
Remedial Management Section  
Division of Remedial Management  
Bureau of Land

cc: Division file